

UNITED STATES DISTRICT COURT

APR 28 2021

for the

Southern District of Texas

Nathan Ochsner, Clerk

United States of America

v.

Alejandro MARTINEZ,
USC
Victor VALLEJO,
USC

Case No. M-21-0906-M

SEALED

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 25, 2021 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 U.S.C. §§ 846, 841(a)(1)

Offense Description

Conspiracy to Possess with Intent to Distribute more than 500 grams of
cocaine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

Before the United States Magistrate Judge, Southern District of Texas, I, Special Agent Jaimie Scott, Drug Enforcement
Administration, being duly sworn, depose and say the following:

See Attachment "A"

☒ Continued on the attached sheet.

Approved:

Robert Williams, AUSA
4/27/2021
Complainant's signature

Jaimie Scott, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

4/28/2021


Judge's signatureCity and state: McAllen, Texas

Nadia S. Medrano, United States Magistrate Judge

Printed name and title

Attachment "A"

1. On January 31, 2021, at approximately 6:00 p.m., a DEA Confidential Source (hereinafter "CS") met with Alejandro MARTINEZ (hereinafter "MARTINEZ") in the parking lot of the Basilica of Our Lady of San Juan Del Valle, in San Juan, Texas. Agents have identified MARTINEZ as a sergeant with the Donna, Texas police department. Agents observed MARTINEZ arrive in a grey Cadillac Escalade with Texas registration TX: KYF7272. MARTINEZ exited the Cadillac Escalade and enter the front passenger seat of the CS's vehicle.
2. The CS had been provided a recording device to record their conversation. The CS discussed with MARTINEZ the CS' intent to traffic narcotics through the City of Donna, Texas. MARTINEZ agreed to provide safe passage of illegal narcotics through the city and thereafter orally identified his work schedule when he would be working as a City of Donna Police Patrol Sergeant. MARTINEZ also instructed the CS to contact Victor VALLEJO (hereinafter "VALLEJO") and coordinate with VALLEJO the movement of the illegal narcotics through the city. Lastly, MARTINEZ stated that the CS knows what is "fair" to pay to him (MARTINEZ) for providing safe passage of the illegal narcotics through the city of Donna.
3. On February 25, 2021 at approximately 11:13pm, during MARTINEZ's shift as a Donna Police Patrol Sergeant, the CS and a DEA Undercover Agent (hereinafter "UC") drove a vehicle laden with five (5) kilograms of cocaine through Donna, Texas. Prior to the UC/CS driving the vehicle through the city of Donna, the CS and MARTINEZ spoke to each other and MARTINEZ told the CS to "go for it" and "I got you". This conversation was recorded. A surveillance team was established along the pre-determined route and

observed the UC/CS vehicle drive through the City of Donna. While the UC/CS vehicle traveled through Donna, VALLEJO was on the phone speaking with the CS and instructing the UC/CS on how to drive without attracting law enforcement. VALLEJO further informs the UC/CS that MARTINEZ would make a traffic stop along this route. The CS understood that MARTINEZ would perform a traffic stop in order to distract other police units that may be in the area. The CS believed that this action would prevent the UC/CS vehicle from being stopped by law enforcement. VALLEJO continues to tell the UC/CS to not panic and to keep driving. VALLEJO also tells the UC/CS the traffic stop is “just for show”.

4. Surveillance units observed VALLEJO, in his white GMC Acadia, follow the UC/CS’s vehicle and traveled in tandem along the pre-determined route. Surveillance units also observed a traffic stop being conducted by a Donna Police unit in the parking lot of Fred Loya Insurance building, located at 522 N Salinas Blvd, Donna, Texas 785378. An agent observed the police officer outside of the unit and positively identified the police officer as MARTINEZ.
5. Once the escort was complete and the UC/CS vehicle safely made it through the City of Donna, surveillance observed the same white GMC Acadia that VALLEJO was earlier driving to the EZ Car Wash, located at 2115 Hooks Ave (Business 83), Donna, Texas 78537. Surveillance units also observed MARTINEZ travel to the same EZ Car Wash. Surveillance observed both drivers talking through their driver’s side windows.
6. At approximately 12:50pm, the CS made a phone call to MARTINEZ to discuss the payment the CS had for MARTINEZ for assisting in the transportation of narcotics through Donna, Texas. MARTINEZ states to the CS that VALLEJO will be his (MARTINEZ’s)

“middleman” for receiving the payment. Shortly after, VALLEJO and MARTIENZ met the CS in a Whataburger parking lot in Donna, Texas. The CS paid MARTINEZ \$1,500.00 in cash for his assistance in the escort and the safe passage of narcotics through the City of Donna. VALLEJO accepted the payment on behalf of MARTINEZ.